

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUTTES

VICTIM RIGHTS LAW CENTER, et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION,  
et al.,

Defendants.

Civil Action No. 25-11042-MJJ

**DECLARATION OF RACHEL OGLESBY**

1. My name is Rachel Oglesby. I make this Declaration based on my own personal knowledge, on information contained in the records of the Department of Education, or on information provided to me by Department of Education employees.
2. I am currently employed as Chief of Staff for the U.S. Department of Education, headquartered in Washington, D.C. I began my service at the Department on January 20, 2025.
3. Before joining the Department, I worked at America First Policy Institute as the Chief State Action Officer and Director of the Center for the American Worker.
4. In my role at the Department, I have the following responsibilities:
  - a. I assist the Secretary of Education with all her responsibilities running the Department.
  - b. I advise the Secretary on significant matters within and affecting the Department.
5. I submitted declarations in the cases of *New York v. McMahon*, Case No. 25-10601-MJJ and *Somerville Public Schools v. Trump*, Case No. No. 25-10677-MJJ, on June 3, 2025, June 10, 2025, June 17, 2025, June 24, 2025, July 1, 2025, and July 8, 2025, the latter two of which included compliance information specific to the preliminary injunction issued by this Court on June 18, 2025 regarding the Department's Office for Civil Rights (the "OCR Order"). I further submitted declarations in this case regarding the OCR Order on July 15, July 22, 2025, July 29, 2025 (which due to technical difficulties was, I believe, filed July 30), and August 5, 2025. I incorporate herein by reference the statements made in my previous declarations. Due to the stay ordered by the United States Supreme Court issued


on July 14, 2025, in the aforementioned *New York* and *Somerville* cases, this declaration addresses compliance activities specific to the OCR Order.

6. Senior officials from the ad hoc committee described in my earlier declarations held discussions on August 11-12, 2025, addressing OCR-specific reintegration activities. By August 12, 2025, the Department had:
- Received approximately 200 boxes mailed out to employees who had retained government furnished equipment (GFE) after receiving RIF notices on March 11, 2025, including for OCR employees who need to exchange GFE for units that have been properly restored and updated.
  - Identified cybersecurity and similar training that reintegrating employees must complete prior to returning to active duty.
  - Discussed with OCR senior leadership a reintegration process for employees who had received RIF notices on March 11, 2025, distinguishing between remote (telework) employees and in-person employees.
  - Continued to pay the salaries and benefits of OCR employees who received RIF notices on March 11, 2025, and have been on paid administrative leave since March 21, 2025, at a cost to the Department of nearly \$1 million per week.
  - Ensured that OCR continues to process, investigate, and resolve complaints:
    - From March 11 to August 11, 2025, OCR received 6,833 complaints; opened 397 for investigation; opened 27 directed investigations; dismissed 4,763 complaints consistent with OCR's Case Processing Manual; resolved 113 complaints after investigation concluded insufficient evidence for findings; and resolved 389 complaints with voluntary agreements, OCR-mediated settlements, or technical assistance from OCR to ensure a recipient's digital resources are accessible to students with disabilities.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, DC this 12<sup>th</sup> day of August, 2025.



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Rachel Oglesby